

# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III  
Governor

John Paul Woodley, Jr.  
Secretary of Natural Resources

5636 Southern Boulevard  
Virginia Beach, VA 23462  
Tel# (757) 518-2000  
<http://www.deq.state.va.us>

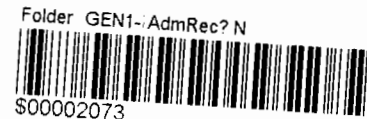
Fax (757) 518-2003

March 13, 2001

Dennis H. Treacy  
Director

Francis L. Daniel  
Tidewater Regional Director

Mr. Jim Parsons  
Environmental Manager  
Perdue Incorporated  
P.O. Box 158  
Showell, MD 21862-0158



**RE: EPA ID #VAD980715312**  
**Perdue Inc. - Accomac**  
**Rte 13 (22520 Lankford Highway)**  
**Accomac (Accomack County)**

Dear Mr. Parsons:

On February 22, 2001, I conducted a RCRA Hazardous Waste Compliance Evaluation Inspection at the referenced facility. During the inspection it was noted that the facility is classified as a **CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CEG)** of hazardous waste. In addition, the facility appears to be in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). The inspection survey and checklist are enclosed.

The facility was previously identified as a Small Quantity Generator (SQG) of hazardous waste in Department files. Based on current monthly hazardous waste generation amounts, and in accordance with your request, the facility's generator universe will be changed to CEG with this inspection report. No further notification is required.

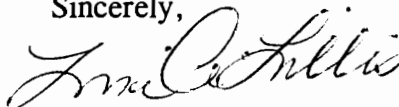
Perdue currently uses solvent-based parts washer units in garage operations, as supplied and serviced by Safety-Kleen Systems of Chesapeake, Virginia. The removed solvent from the Safety-Kleen units is the only regular hazardous waste stream for Perdue. It is suggested that you consider switching to a non-hazardous or less-hazardous waste-generating alternative, such as

Mr. Jim Parsons  
March 13, 2001  
Page 2 of 2

closed-loop units that recycle the cleaning solvent. Use of the closed-loop units would reduce the solvent waste stream significantly. The closed loop systems may generate no hazardous waste with the exception of bottom sludge. The sludge is slowly generated based on the amount of "dirt" on parts and, upon analysis, may be non-hazardous. There are also a number of aqueous or other solvent-based systems that do not generate a hazardous waste when spent (such as the Zep systems currently in use in the processing plant). [It is noted that with the current solvent-based system, generation of greater than 33 gallons per service (or per month) would place Perdue back into the small quantity generator universe.] Mr. Ron Pinkoski, of the Department's Office of Pollution Prevention, accompanied me on the recent site visit. Please feel free to contact Mr. Pinkoski at (757) 518-2007 for information on non-hazardous or less-hazardous waste generating parts washers and solutions.

Please contact me at (757) 518-2175 if you have any questions about the content of this letter or need additional guidance in achieving or maintaining compliance.

Sincerely,



Lisa A. Lillis  
Environmental Inspector Senior

Enclosures

c: Christian Braun, DEQ, OTA  
Ron Pinkoski, DEQ-TRO, OPP  
File

Revised January 1994

## DEPARTMENT OF ENVIRONMENTAL QUALITY

### SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: **Perdue, Inc. - Accomac**

ADDRESS: Route 13 (22520 Lankford Highway)  
Accomac, VA 23301 (Accomack County)

EPA ID NUMBER: **VAD980715312**

FACILITY  
REPRESENTATIVE: James Eichelberger

TITLE: Environmental Manager

TELEPHONE NUMBER: (757) 787-5210

INSPECTOR'S NAME: Lisa A. Lillis

TITLE: Environmental Inspector Senior

DATE of INSPECTION: February 22, 2001

- 
1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

Chicken processor (Hazardous waste generated in garage operations.)

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

RQ waste combustible liquid, n.o.s. (petroleum naphtha) –  
D001/D018/D039/D040 (6.7#/gallon)

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
Pre-Autumn 2000	328 lbs (49 gal)	228 lbs (34 gal)
Post-Autumn 2000	194 lbs (29 gal)	194 lbs (29 gal)

**NOTE:** Prior to CY2000, the facility had three 30-gallon Safety-Kleen parts washer units. One unit was removed from service in the summer of 1999. Until the autumn of 2000, Safety-Kleen would sometimes service more than once a month or remove 34 gallons or more per month. Since autumn 2000, Safety-Kleen has removed no more than 33 gallons of spent parts washer solvent per month (average is 29 gallons). The facility will continue the service at this level to maintain quantities below the criterion for SQG. The facility will investigate non-hazardous waste alternatives.

4. Does the facility ever generate greater than:  
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)? NO
- 100 kg of clean up from a spill of P listed waste or F020-F023 and F026-F027 waste? NO
- If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

Transporter:

Safety-Kleen

EPA ID #ILD984908202

EPA ID #SCR000075150

Disposal Facility:

Safety-Kleen

Chesapeake, VA

EPA ID #VAD000737346

6. Does the facility generate any hazardous waste that is excluded from regulation? If **yes**, list the waste and the basis for exclusion. NO

7. Does the facility:

**Generate**

**Market**

**Burn**

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility **markets** or burns used oil, fill out the **Used Oil Checklist.**)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist.**

NO

Used oil is handled by Mid-States Oil, Baltimore, MD. Used oil is re-refined. Oil is sampled annually.

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If **Yes**, list the waste, where it is sent, and complete the **Metals Recovery Checklist.**

9. Does the facility **GENERATE**, transport, store, collect or reclaim spent lead-acid batteries? If **yes**, Underline or **circle** all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**. YES

Batteries are returned to the vendor for regeneration.

10. Based on the above, the facility is a:
- a. CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR\*
  - b. small quantity generator
  - c. generator
  - d. permitted or interim status TSD
  - e. unpermitted TSD (explain in comments section)
  - f. transporter
  - g. other: please explain \_\_\_\_\_

[Underline or **Circle** All That Are Applicable]

\*Based on current monthly generation quantities.

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
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(Not applicable to Safety-Kleen parts washer units and service contracts. No accumulation prior to off site transport.)

13. Comments:

(See cover letter to this report for additional details.)

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

Only hazardous waste is generated from spent solvent in two 30-gallon parts washer units in the facility's garage. The plant uses a non-hazardous parts solution in the plant (Zep Dyna). No hazardous waste is generated from chicken processing, the quality assurance laboratory, or the wastewater treatment plant. (All parts of the chicken are either processed for sale or sent for rendering.) Antifreeze is reused. The plant has begun switching from fluorescent bulbs to sodium vapor bulbs. This switch is completed as bulbs expire. The plant is reducing the uses of CFC-aerosols and those in use are depleted before disposal of the empty container. All other plant chemicals or maintenance supplies (e.g., paint) are used until exhausted.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR CHECKLIST**

40 CFR CITATION	REGULATION	YES	NO	NA	NC
261.5	1. In order for HW from a CESQG to be excluded from full regulation, the generator shall comply with Section 262.11, HW determination. Has the generator determined if his waste is hazardous waste?  <b>NOTE: If CESQG accumulation at any time exceeds 1,000 kilograms, then it is a SQG!</b>	X			
261.5(f) or (g)	2. The CESQG may treat or dispose of his waste in an on-site facility, or ensure delivery to an off-site facility, either of which is:	X			
	a. A permitted facility; or	X			
	b. An interim status facility; or				
	c. A permitted, licensed, or registered municipal or industrial solid waste facility that is authorized to accept HW; or (If YES, complete the "Virginia State Specific Requirements" Checklist and attach copy of letters granting permission)				
	d. A facility which beneficially uses or reuses, or legitimately recycles or reclaims the waste; or				
	e. A facility which treats the waste prior to beneficial use or reuse, or legitimate recycling or reclamation.				

COMMENTS: (See cover letter and survey section to this report for additional details.)



Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification

E. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

VAD980715312

## II. Name of Installation (Include company and specific site name)

PERDUE FARMS INC. ACCOMAC

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

22520 LANFORD HWY

Street (continued)

City or Town

ACCOMAC

State

ZIP Code

VA 23301-0021

County Code

County Name

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P.O. Box 21

City or Town

ACCOMAC

State

ZIP Code

VA 23301-0021

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

EICHELBERGER

(first)

JAMES

Job Title

ENV. MANAGER

Phone Number (area code and number)

804-787-5210

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing

B. Street or P.O. Box

City or Town

State

ZIP Code

## VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

PERDUE FARMS INC.

Street, P.O. Box, or Route Number

P.O. Box 1537

City or Town

SALISBURY

State

ZIP Code

MD 21801-1537

Phone Number (area code and number)

410-543-3000

B. Land Type

P

C. Owner Type

P

D. Change of Owner  
Indicator

Yes

No

(Date Changed)  
Month Day Year

MAY 1 1993

ID: For Official Use Only									
1	2	3	4	5	6	7	8	9	0

## VIII. Type of Regulated Waste Activity (Mark X in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
1. Generator (See instructions)	<input checked="" type="checkbox"/>	1. Off-Specification Used Oil Fuel	<input type="checkbox"/>
a. Greater than 1000 kg/mo (2,200 lbs.)	<input type="checkbox"/>	a. Generator Marketing to Burner	<input type="checkbox"/>
b. 100 to 1000 kg/mo (220 - 2,200 lbs.)	<input checked="" type="checkbox"/>	b. Other Marketer	<input type="checkbox"/>
c. Less than 100 kg/mo (220 lbs.)	<input type="checkbox"/>	c. Burner (Indicate device(s))	<input type="checkbox"/>
2. Transporter (Indicate Mode in boxes 1-5 below)	<input type="checkbox"/>	Type of Combustion Device	<input type="checkbox"/>
a. Petroleum waste only	<input type="checkbox"/>	1. Utility Boiler	<input type="checkbox"/>
b. For commercial purposes	<input type="checkbox"/>	2. Industrial Boiler	<input type="checkbox"/>
Mode of Transportation	<input type="checkbox"/>	3. Industrial Furnace	<input type="checkbox"/>
1. Air	<input type="checkbox"/>	2. Specification Used Oil Fuel Marketer	<input type="checkbox"/>
2. Rail	<input type="checkbox"/>	or On-site Burner (Indicate device(s))	<input type="checkbox"/>
3. Highway	<input type="checkbox"/>	Type of Combustion Device	<input type="checkbox"/>
4. Water	<input type="checkbox"/>	1. Utility Boiler	<input type="checkbox"/>
5. Other (specify)	<input type="checkbox"/>	2. Industrial Boiler	<input type="checkbox"/>
3. Treater, Storer, Disposer (at installation)	<input type="checkbox"/>	3. Industrial Furnace	<input type="checkbox"/>
Note: A permit is required for this activity; see instructions.	<input type="checkbox"/>	5. Underground Injection Control	<input type="checkbox"/>
4. Hazardous Waste Fuel	<input type="checkbox"/>		
a. Generator Marketing to Burner	<input type="checkbox"/>		
b. Other Marketer	<input type="checkbox"/>		
c. Burner (Indicate device(s))	<input type="checkbox"/>		
Type of Combustion Device	<input type="checkbox"/>		
1. Utility Boiler	<input type="checkbox"/>		
2. Industrial Boiler	<input type="checkbox"/>		
3. Industrial Furnace	<input type="checkbox"/>		

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark X in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)			
1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s):			
D039			

## B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

## C. Other Wastes. (State other wastes requiring an ID number. See instructions.)

1	2	3	4	5	6
029 L					

## X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature	Name and Official Title (type or print)	Date Signed
<i>[Signature]</i>	JAMES EICHELBERGER ENVIRONMENTAL MANAGER	9-3-92

## XI. Comments


Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



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# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

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A. First Notification

E. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

VAD980715312

## II. Name of Installation (Include company and specific site name)

PERDUE FARMS INC. ACCOMAC

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

22520 LANKFORD HWY

Street (continued)

City or Town

ACCOMAC

State

ZIP Code

VA 23301-0021

County Code

County Name

001 Accomack

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

P.O. Box 21

City or Town

ACCOMAC

State

ZIP Code

VA 23301-0021

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

EICHELBERGER

(first)

JAMES

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Phone Number (area code and number)

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## VI. Installation Contact Address (See Instructions)

A. Contact Address

Location Mailing



B. Street or P.O. Box

City or Town

State

ZIP Code

## VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

PERDUE FARMS INC

Street, P.O. Box, or Route Number

P.O. Box 1537

City or Town

SALISBURY

State

ZIP Code

MD 21801-1537

Phone Number (area code and number)

410-543-3000

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

(Date Changed)

Month

Day

Year

RECEIVED  
EPA, R3  
SEP 17 1991

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

**IX. Description of Regulated Wastes (Use additional sheets if necessary)**

<b>B. Listed Hazardous Wastes.</b> (See 40 CFR 261.31–39. See instructions if you need to list more than 12 waste codes.)															
<b>1</b>															
<b>2</b>															
<b>3</b>															
<b>4</b>															
<b>5</b>															
<b>6</b>															
<b>7</b>															
<b>8</b>															
<b>9</b>															
<b>10</b>															
<b>11</b>															
<b>12</b>															

X. Qualification

Signature 	Name and Official Title (type or print) <b>JAMES EICHELBERGER</b> <b>ENVIRONMENTAL MANAGER</b>	Date Signed <b>9-3-92</b>
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Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)





ID — For Official Use Only														
C													T/A	C
W														1

# X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 D001	2 D000	3	4	5	6
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☒ 4. Toxic  
(D000)

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

X Bruce Melham

X GARAGE MANAGER

X 10/02/86



ACKNOWLEDGEMENT OF NOTIFICATION  
OF REGULATED WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+

VAD980715312

INSTALLATION ADDRESS

PERDUE INC - ACCOMAC  
22520 LANKFORD HWY RTE 13  
ACCOMAC , VA 23301  
JAMES BICHELBERGER ENV MGR

22520 LANKFORD HWY RTE 13  
ACCOMAC , VA 23301